

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) ECF Case
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This document relates to:

Ashton, *et al.* v. Al Qaeda Islamic Army, *et al.*, Case No. 02-CV-6977;
Burnett, *et al.* v. Al Baraka Inv. & Dev. Corp., *et al.*, Case No. 03-CV-9849;
Cantor Fitzgerald Assocs, LP, *et al.* v. Akida Inv. Co., Ltd., *et al.*, Case No. 04-CV-7065;
Continental Cas. Co., *et al.* v. Al Qaeda Islamic Army, *et al.*, Case No. 04-CV-05970;
Euro Brokers, Inc., *et al.* v. Al Baraka Inv. & Dev. Corp., *et al.*, Case No. 04-CV-07279;
Federal Ins. Co., *et al.* v. Al Qaida, *et al.*, Case No. 03-CV-6978; and
Estate of O'Neill, *et al.* v. Al Baraka Inv. & Dev. Corp., *et al.*, Case No. 04-CV-1923.

**DECLARATION OF ROBERT T. HAEFELE
(Plaintiff's Reply to Al Haramain's Opposition to Plaintiffs'
Renewed Motion for Sanctions)**

1. I am an attorney admitted to practice before this Court and I am an attorney at the firm of Motley Rice LLC, counsel for Plaintiffs in *Burnett, et al. v. Al Baraka Investment & Development Corp. et al.*, Civil Action No. 03 CV 9849. I submit this declaration to identify and transmit the exhibits referenced in Plaintiffs' November 25, 2015 Reply to Al Haramain's Opposition to Plaintiffs' Renewed Motion for Sanctions;
2. Attached hereto are true and accurate copies of the following exhibits referenced in the Plaintiffs' November 25, 2015 Plaintiffs' Reply to Al Haramain's Opposition to Plaintiffs' Renewed Motion for Sanctions accompanying this declaration:
 - **Exhibit A** is a true and accurate copy of documents produced by the defendant bearing bates stamps AHIF 3127 – 31 (Global Terrorism Sanctions Regulations Amended License No, SDGT-343e and SDGT-929);

- **Exhibit B** is a true and accurate copy of Plaintiffs' Request for Production of Documents to Al Haramain Islamic Foundation, Inc. a/k/a Al-Haramain, a/k/a Islamic Al-Haramain, dated October 29, 2003.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 25, 2015.

/S/ Robert T. Haefele

Robert T. Haefele